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Attorney for Debtor & Defendant: Ronald George DePaul

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

LEE BITNER ,

Plaintiff,

vs.

RONALD G. DEPAUL,

Defendants.

)
) Case No.: 13-11075-LA7
) ADVERSARY CASE NO.:14-90021-LA
)
) **OPPOSITION TO MOTION FOR**
) **SUMMARY JUDGMENT**
)
)
) **Date of Hearing: 8/28/2014**
) **Time: 10:30 AM**
) **Department: 2**
) **Judge**
) **Honorable Louise Adler**
)

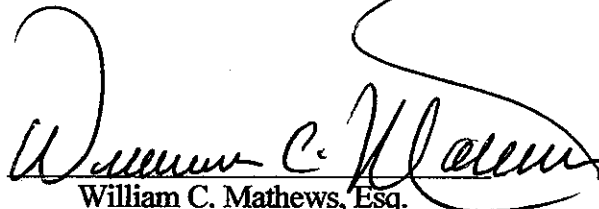
TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

COMES NOW Defendant RONALD GEORGE DEPAUL to oppose Plaintiff Lee Bittner's Motion for summary judgment. Defendant opposes the Motion on the grounds that Defendant did not receive the required notice of 75 days pursuant to California Code of Civil Procedure 437c (a). Furthermore Plaintiff's Motion is defective in that it does not contain the required Separate Statement of

1 undisputed facts. California Code of Civil Procedure 437c (b)(1). Finally, both Plaintiff and Defendant
2 have agreed to a discovery plan, however, the plan has not yet been implemented by either party.
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6 Dated: 7/29/2014

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Adversary Case No.: 14-90021-LA

DECLARATION OF SERVICE BY MAIL (C.C.P. 1031a and 2015.5)

I am over the age of 18 years and not a party to the within entitled action; my business address is 2801 Camino del Rio South, Ste. 307, San Diego, CA 92108. On 7/30/2014 I served the attached document(s):
DECLARATION OF SERVICE BY MAIL (C.C.P. 1031a and 2015.5)

Opposition to Motion for Summary Judgment

By placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego County, California, addressed as follows:

GREGORY Y. LIEVERS, ESQ 110837
LAW OFFICES OF GREGORY Y. LIEVERS
5860 Owens Avenue, Suite 210
Carlsbad, CA 92008
Tel: (760) 268-1947

I declare under penalty of perjury that the foregoing is true and correct. Executed on 7/30/2014 in San Diego County, California.


WENDY MARES

Bittner v. DePaul, Adversary Case Number: 13-11075-LA7

Defendant's OPPOSITION to MSJ